RE: ***FRITO LAY 023-16204-00020***
TO: Interested Parties / Applicant February 4, 2003

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for consideration at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

(over)

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
Administrator, Christine Todd Whitman
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

(317) 232-8603
(800) 451-6027
www.IN.gov/idem

February 4, 2003

Frank Armetta
Frito-Lay, Inc.
323 S. County Rd., 300 W.
Frankfort, IN 46041-8780

Re: 023-16204-00020
Significant Permit Modification to:
Part 70 permit No.: T023-7721-00020

Dear Mr. Armetta:

Frito-Lay, Inc. was issued Part 70 operating permit T023-7721-00020 on April 12, 2001 for operation of a snack food products manufacturing plant. A letter requesting changes to this permit was received on September 4, 2002. Pursuant to the provisions of 326 IAC 2-7-12 (d) (1) a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. The revised permit pages are attached.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter please contact Alic Bent, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (973) 575-2555, ext. 3206 or dial (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
AB/EVP
cc: File - Clinton County
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Karen Nowak
Technical Support and Modeling - Michele Boner
Administrative and Development

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Frito-Lay, Incorporated
323 S. County Road 300 W.
Frankfort, IN 46041

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T023-7721-00020	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 12, 2001 Expiration Date: April 12, 2006
1st Minor Source Modification 023-11082-00020	Issuance Date: July 23, 1999
Exemption 023-11942-00020	Issuance Date: June 12, 2000
1st Administrative Amendment 023-14229-00020	Issuance Date: May 31, 2001
2nd Administrative Amendment 023-16101-00020	Issuance Date: September 12, 2002
First Significant Permit Modification 023-16204-00020	Pages Affected: : 1, 9, 39 and 40
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 4, 2003

(b) East plant, consisting of the following:

(9) Storage and transfer operations, consisting of:

(A) three (3) Corn Receiving/Storage (3 silos), identified as NBP9A(F) constructed in 1990 and exhausting to stack NBP9A(F);

(B) Corn Internal Ops (Cleaner), identified as NBP9B(F), constructed in 1990, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust: NBP9B(F);

(C) one (1) Wheat Grain Receiving/Storage (Silo 1), identified as NBP18, constructed in 1994, utilizing a fabric filter for particulate control and exhausting to stack NBP18;

(D) one (1) Wheat Grain Receiving/Storage (Silo 2), identified as NBP19, constructed in 1994, utilizing a fabric filter for particulate control and exhausting to stack NBP19;

(E) Whole Grain Cleaner, identified as NBP17(F), constructed in 1994, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust:: NBP17(F);

(F) one (1) Corn Meal Receiving/Storage (Silo 1), identified as NBP20, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP20;

(G) one (1) Corn Meal Receiving/Storage (Silo 2), identified as NBP21, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP21;

(H) one (1) Corn Meal Transfer, identified as NBP22(F), constructed in 1991, utilizing a fabric filter and exhausting indoors as fugitive dust: NBP22(F);

(I) one (1) Wheat Meal Receiving/Storage (Silo 1), identified as NBP23, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP23;

(J) one (1) Wheat Meal Receiving/Storage (Silo 2), identified as NBP24, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP24;

(K) one (1) Wheat Meal Transfer, identified as NBP25(F), constructed in 1991, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust: NBP25(F);

(L) Corn Unloading/Storage Silo #4 , identified as NBP9C, constructed in 2003, utilizing a fabric filter for particulate control and exhausting to stack NBP9C;

(M) Corn Unloading/Storage Silo #5, identified as NBP9D, constructed in 2003, utilizing a fabric filter for particulate control and exhausting to stack NBP9D;

(N) Corn Transfer/Cleaner, identified as NBP9E, constructed in 2003, utilizing a fabric filter for particulate control and exhausting to stack NBP9E;

(O) Cornmeal Unloading Silo #3, identified as NBP22A, constructed in 2003, utilizing a fabric filter for particulate control and exhausting to stack NBP22A;

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(b) East plant, consisting of the following:

(9) Storage and transfer operations, consisting of:

(A) three (3) Corn Receiving/Storage (3 silos), identified as NBP9A(F) constructed in 1990 and exhausting to stack NBP9A(F);

(B) Corn Internal Ops (Cleaner), identified as NBP9B(F), constructed in 1990, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust: NBP9B(F);

(C) one (1) Wheat Grain Receiving/Storage (Silo 1), identified as NBP18, constructed in 1994, utilizing a fabric filter for particulate control and exhausting to stack NBP18;

(D) one (1) Wheat Grain Receiving/Storage (Silo 2), identified as NBP19, constructed in 1994, utilizing a fabric filter for particulate control and exhausting to stack NBP19;

(E) Whole Grain Cleaner, identified as NBP17(F), constructed in 1994, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust: NBP17(F);

(F) one (1) Corn Meal Receiving/Storage (Silo 1), identified as NBP20, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP20;

(G) one (1) Corn Meal Receiving/Storage (Silo 2), identified as NBP21, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP21;

(H) one (1) Corn Meal Transfer, identified as NBP22(F), constructed in 1991, utilizing a fabric filter and exhausting indoors as fugitive dust: NBP22(F);

(I) one (1) Wheat Meal Receiving/Storage (Silo 1), identified as NBP23, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP23;

(J) one (1) Wheat Meal Receiving/Storage (Silo 2), identified as NBP24, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP24;

(K) one (1) Wheat Meal Transfer, identified as NBP25(F), constructed in 1991, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust: NBP25(F);

(L) one (1) Corn Unloading/Storage Silo #4 , identified as NBP-9C, constructed in 2003, utilizing a fabric filter for particulate control and exhausting to stack NBP-9C;

(M) one (1) Corn Unloading/Storage Silo #5, identified as NBP-9D, constructed in 2003, utilizing a fabric filter for particulate control and exhausting to stack NBP-9D;

(N) one (1) Corn Transfer/Cleaner, identified as NBP-9E, constructed in 2003, utilizing a fabric filter for particulate control and exhausting to stack NBP-9E;

(O) one (1) Cornmeal Unloading Silo #3, identified as NBP-22A, constructed in 2003, utilizing a fabric filter for particulate control and exhausting to stack NBP-22A;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the snackfood manufacturing operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of allowable emissions in pounds per hour; and P = process weight rate in tons per hour

The source is complying with the limits and the compliance calculations for 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) are contained in a confidential file.

D.2.2 Visible Emissions [326 IAC 2-7-10.5(d)(5)(C)]

Pursuant to 326 IAC 2-7-10.5(d)(5)(C)(ii) the operation of units NBP-9C, NBP-9D, NBP-9E, and NBP-22B may continue only if there are no visible emissions.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the fabric filter controlled devices venting to the atmosphere associated with the equipments identified as NBP-9C, NBP-9D, NBP-9E, NBP-18, NBP-19, NBP-20, NBP-21, NBP-22A, NBP-23, NBP-24, NBP-37, and NBP-38 and their control devices.

D.2.4 Particulate Matter Emissions

(a) Pursuant to OP12-11-88-0121, issued on December 17, 1984, all corn shall be precleaned before being received at the plant.

(b) Pursuant to CP023-0020-0142, the corn cleaning and sizing fabric filter (NBP-9B) shall have no visible emissions crossing the proper line or exceeding 10% opacity over a six minute averaging period at the equipment site.

Compliance Determination Requirements

D.2.5 Particulate Matter (PM)

The fabric filters for PM control shall be in operation and control emissions from the equipments identified in Condition D.2.2 at all times that the equipments are in operation.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.6 Record Keeping Requirements

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

February 4, 2003

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Minor Source Modification and a Part 70 Significant Permit Modification.

Source Background and Description

Source Name:	**Frito-Lay, Inc.**
Source Location:	**323 S. County Rd., 300 W., Frankfort, IN 46041-8780**
County:	**Clinton**
SIC Code:	**2096**
Operation Permit No.:	**T 023-7721-00020**
Operation Permit Issuance Date:	**April 12, 2001**
Minor Source Modification No.:	**023-16054-00020**
Significant Permit Modification No.:	**023-16204-00020**
Permit Reviewer:	**Alic Bent/EVP**

The Office of Air Quality (OAQ) has reviewed a modification application from Frito-Lay, Inc. relating to the construction of the following emission units and pollution control devices:

Storage and transfer operations, consisting of:

(a) Corn Unloading/Storage Silo #4 , identified as NBP-9C, utilizing a fabric filter for particulate control and exhausting to stack NBP-9C;

(b) Corn Unloading/Storage Silo #5, identified as NBP-9D, utilizing a fabric filter for particulate control and exhausting to stack NBP-9D;

(c) Corn Transfer/Cleaner, identified as NBP-9E, utilizing a fabric filter for particulate control and exhausting to stack NBP-9E;

(d) Cornmeal Unloading Silo #3, identified as NBP-22A, utilizing a fabric filter for particulate control and exhausting to stack NBP-22A;

History

On September 4, 2002, Frito-Lay, Inc. submitted an application to the OAQ requesting to add additional storage and transfer operations to their existing plant. Frito-Lay, Inc. was issued a Part 70 permit on April 12, 2001.

Existing Approvals

The source was issued a Part 70 Operating Permit T023-7721-00020 on April 12, 2001. The source has since received the following:

(a) Minor Source Modification No.: 023-11082, issued on July 23, 1999;

(b) Exemption No.: 023-11942, issued on June 12, 2000;

(c) First Administrative Amendment No.: 023-14229, issued on May 31, 2001; and

(d) Second Administrative Amendment No.: 023-16101, issued on September 12, 2002.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
NBP-9C	Unloading/Storage	61	0.5	19	Ambient
NBP-9D	Unloading/Storage	61	0.5	19	Ambient
NBP-9E	Transfer/Cleaning	43	1.67	4900	Ambient
NBP-22A	Unloading	70	0.67	500	Ambient

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 4, 2002.

Emission Calculations

See Appendix A: page 1 of 1 of this document for detailed emissions calculations.

Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	204.16
PM-10	204.16
SO_2	0.0
VOC	0.0
CO	0.0
NO_x	0.0

Justification for Modification

The Title V permit is being modified through a Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(5)(C), this is a minor source modification for which the

potential to emit of PM-10 is limited to less than twenty-five (25) tons per year by using a baghouse with better than 99% control efficiency. The Minor Source Modification will be incorporated into the permit through a Significant Permit Modification because new compliance monitoring conditions are required to be added to the existing title V permit.

County Attainment Status

The source is located in Clinton County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Clinton County has been designated as attainment or unclassifiable for ozone.

(b) Clinton County has been classified as attainment for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
This type of operation is not one of the 28 listed source categories under 326 IAC 2-2; therefore, the fugitive PM emissions are not counted toward determination of PSD applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	greater than 100, less than 250
PM-10	greater than 100, less than 250
SO_2	greater than 250
VOC	less than 100
CO	less than100
NOx	greater than 250

(a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the Part 70 permit T023-7721-00020 issued on April 12,

2001.

Potential to Emit of Modification After Issuance

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
NBP-9C (1)	0.01	0.01	-	-	-	-	-
NBP-9D (1)	0.01	0.01	-	-	-	-	-
NBP-9E (1)	1.84	1.84	-	-	-	-	-
NBP-22A (1)	0.19	0.19	-	-	-	-	-
Total Emissions	2.05	2.05	-	-	-	-	-

(1) Based on controlled PM and PM-10 potential emissions.

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

(a) This modification is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.300, Subpart DD- Standards of Performance for Grain Elevators), because this modification does not have grain terminal elevators with a permanent storage capacity of more than 2.5 million U.S. bushels or grain storage elevators with a permanent grain storage capacity of 1 million bushels.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Subpart 63) applicable to this source.

State Rule Applicability - Individual Facilities

326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration (PSD))

This modification to a PSD major source is not subject to this rule. This rule applies to modifications with the potential to emit (PTE) greater than or equal to 25 tons of PM per year and the potential to emit (PTE) greater than or equal to 15 tons of PM-10 per year. This modification is controlled to a PTE PM and PM-10 of 2.05 tons per year each by using fabric filters. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 the particulate shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Facilities	Process Weight Rate (tons/hr)	PM Allowable Emissions (lb/hr)	Compliance Calculations (lb/hr)
NBP-9C	confidential	5.0	0.16 (uncontrolled)
NBP-9D	confidential	5.0	0.16 (uncontrolled)
NBP-9E	confidential	12.0	0.42
NBP-22A	confidential	15.0	0.04

These facilities are in compliance with these PM allowable emissions, since their emissions after control are less than the PM allowable emissions. The baghouses shall be in operation at all times NBP-9E and NBP-22A are in operation, in order to comply with these limits.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. NBP-9E and NBP-22A have applicable compliance monitoring conditions as specified below:

   (a) Once per shift visible emissions notations of NBP-9E and NBP-22A stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to

prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(b) The Permittee shall record the total static pressure drop across the baghouses controlling NBP-9E and NBP-22A, at least once per shift when the units are in operation. When for any one reading, the pressure drop across the baghouses are outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports.

(c) An inspection shall be performed each calender quarter of all bags controlling NBP-9E and NBP-22A. All defective bags shall be replaced.

(d) In the event that bag failure has been observed:

(1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouses for NBP-9E and NBP-22A must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

Changes to the Part 70 Permit

The following changes are made as the Significant Permit Modification to the Part 70 Permit T023-7721-00020. (New is shown in bold and deleted language is shown with a line through it):

1. Section A.2 has been revised to include the new equipments (NBP-9C, NBP-9D, NBP-9E and NBP-22A).

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(b) East plant, consisting of the following:
- (9) Storage and transfer operations, consisting of:
  - (A) three (3) Corn Receiving/Storage (3 silos), identified as NBP9A(F) constructed in 1990 and exhausting to stack NBP9A(F);
  - (B) Corn Internal Ops (Cleaner), identified as NBP9B(F), constructed in 1990, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust: NBP9B(F);
  - (C) one (1) Wheat Grain Receiving/Storage (Silo 1), identified as NBP18, constructed in 1994, utilizing a fabric filter for particulate control and exhausting to stack NBP18;
  - (D) one (1) Wheat Grain Receiving/Storage (Silo 2), identified as NBP19, constructed in 1994, utilizing a fabric filter for particulate control and exhausting to stack NBP19;
  - (E) Whole Grain Cleaner, identified as NBP17(F), constructed in 1994, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust:: NBP17(F);
  - (F) one (1) Corn Meal Receiving/Storage (Silo 1), identified as NBP20, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP20;
  - (G) one (1) Corn Meal Receiving/Storage (Silo 2), identified as NBP21, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP21;
  - (H) one (1) Corn Meal Transfer, identified as NBP22(F), constructed in 1991, utilizing a fabric filter and exhausting indoors as fugitive dust: NBP22(F);
  - (I) one (1) Wheat Meal Receiving/Storage (Silo 1), identified as NBP23, constructed in 1991, utilizing a fabric filter for particulate control and

exhausting to stack NBP23;

(J) one (1) Wheat Meal Receiving/Storage (Silo 2), identified as NBP24, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP24;

(K) one (1) Wheat Meal Transfer, identified as NBP25(F), constructed in 1991, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust: NBP25(F);

(L) Corn Unloading/Storage Silo #4 , identified as NBP-9C, utilizing a fabric filter for particulate control and exhausting to stack NBP-9C;

(M) Corn Unloading/Storage Silo #5, identified as NBP-9D, utilizing a fabric filter for particulate control and exhausting to stack NBP-9D;

(N) Corn Transfer/Cleaner, identified as NBP-9E, utilizing a fabric filter for particulate control and exhausting to stack NBP-9E;

(O) Cornmeal Unloading Silo #3, identified as NBP-22A, utilizing a fabric filter for particulate control and exhausting to stack NBP-22A;

2. Equipment list for section D.2 has been revised to include the new equipments (NBP-9C, NBP-9D, NBP-9E and NBP-22A).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(b) East plant, consisting of the following:

(9) Storage and transfer operations, consisting of:

(A) three (3) Corn Receiving/Storage (3 silos), identified as NBP9A(F) constructed in 1990 and exhausting to stack NBP9A(F);

(B) Corn Internal Ops (Cleaner), identified as NBP9B(F), constructed in 1990, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust: NBP9B(F);

(C) one (1) Wheat Grain Receiving/Storage (Silo 1), identified as NBP18, constructed in 1994, utilizing a fabric filter for particulate control and exhausting to stack NBP18;

(D) one (1) Wheat Grain Receiving/Storage (Silo 2), identified as NBP19, constructed in 1994, utilizing a fabric filter for particulate control and exhausting to stack NBP19;

(E) Whole Grain Cleaner, identified as NBP17(F), constructed in 1994, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust: NBP17(F);

(F) one (1) Corn Meal Receiving/Storage (Silo 1), identified as NBP20, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP20;

(G) one (1) Corn Meal Receiving/Storage (Silo 2), identified as NBP21, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP21;

(H) one (1) Corn Meal Transfer, identified as NBP22(F), constructed in 1991, utilizing a fabric filter and exhausting indoors as fugitive dust: NBP22(F);

(I) one (1) Wheat Meal Receiving/Storage (Silo 1), identified as NBP23, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP23;

(J) one (1) Wheat Meal Receiving/Storage (Silo 2), identified as NBP24, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP24;

(K) one (1) Wheat Meal Transfer, identified as NBP25(F), constructed in 1991, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust: NBP25(F);

(L) one (1) Corn Unloading/Storage Silo #4 , identified as NBP-9C, utilizing a fabric filter for particulate control and exhausting to stack NBP-9C;

(M) one (1) Corn Unloading/Storage Silo #5, identified as NBP-9D, utilizing a fabric filter for particulate control and exhausting to stack NBP-9D;

(N) one (1) Corn Transfer/Cleaner, identified as NBP-9E, utilizing a fabric filter for particulate control and exhausting to stack NBP-9E;

(O) one (1) Cornmeal Unloading Silo #3, identified as NBP-22A, utilizing a fabric filter for particulate control and exhausting to stack NBP-22A;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

3. Condition D.2.1 has been updated to include revisions made to the 326 IAC 6-3 rule, which became effective June 12, 2002. Condition D.2.5 has been deleted, and compliance monitoring and record keeping requirements have been added as new conditions D.2.5, D.2.6, D.2.7, D.2.8 and D.2.9 for units NBP-9E and NBP-22A.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate ~~Matter (PM)~~ [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (~~Process Operations~~ **Particulate Emission Limitations for Manufacturing Processes**), the **allowable** particulate ~~matter (PM)~~ emission rate from the snackfood manufacturing operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of allowable emissions in pounds per hour; and P = process weight rate in tons per hour

The source is complying with the limits and the compliance calculations for 326 IAC 6-3-2 (~~Process Operations~~ **Particulate Emission Limitations for Manufacturing Processes**) are contained in a confidential file.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the fabric filter controlled devices venting to the atmosphere associated with equipment**s** identified as **NBP-9E, NBP-22A,** NBP-18, NBP-19, NBP-20, NBP-21, NBP-23, NBP-24, NBP-37, and NBP-38 and their control devices.

D.2.3 Particulate Matter Emissions

(a) Pursuant to OP12-11-88-0121, issued on December 17, 1984, all corn shall be precleaned before being received at the plant.

(b) Pursuant to CP023-0020-0142, the corn cleaning and sizing fabric filter (NBP-9B) shall

have no visible emissions crossing the proper line or exceeding 10% opacity over a six minute averaging period at the equipment site.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

The fabric filters for PM control shall be in operation and control emissions from the equipments identified in Condition D.2.2 at all times that the equipment**s** ~~is~~ **are** in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.5 Visible Emissions Notations

(a) Visible emission notations of NBP-9E and NBP-22A stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with NBP-9E and NBP-22A, at least once per shift when the units are in operation. When for any one reading, the pressure drop across the baghouses are outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan -Failure to Take Response. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.7 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the units. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

~~**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**~~

~~D.2.5 Record Keeping Requirements~~

~~(a) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain once per shift records of visible emission notations of NBP-9E and NBP-22A stack exhausts.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain once per shift records of the total differential static pressure during normal operation.

(c) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Conclusion

The operation of this snack food manufacturing operation shall be subject to the conditions of the attached proposed Minor Source Modification No. 023-16054-00020 and Significant Permit Modification No. 023-16204-00020.

February 4, 2003

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document (TSD) for a Part 70 Permit Significant Permit Modification

Source Name:	Frito-Lay, Inc.
Source Location:	323 S. County Rd., 300 W., Frankfort, IN 46041-8780
SIC Code:	2096
County:	Clinton
Operation Permit No.:	SPM 023-16204-00020
Permit Reviewer:	Alic Bent /EVP

On November 6, 2002, the Office of Air Quality (OAQ) had a notice published in the Times in Frankfort, Indiana, stating that Frito-Lay, Inc. had applied for a Part 70 Significant Permit Modification for the construction of an additional storage and transfer operation. The notice also stated that OAQ proposed to issue a Significant Permit Modification for this construction and provided information on how the public could review the proposed Significant Permit Modification and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Significant Permit Modification should be issued as proposed.

On December 4, 2002, RMT, Inc., on behalf of Frito-Lay, Inc. submitted comments on the proposed permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

The following revisions have been made to the Technical Support Document (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment #1

Technical Support Document (Page 2 of 11)

The annual potential to emit (PTE) PM and PM-10 before controls (associated with this modification) are corrected to match the annual uncontrolled PTE PM and PM-10 emission rates presented in Attachment D (28.19 tpy PM and 7.21 tpy PM-10).

Response #1

The annual potential to emit (PTE) PM and PM-10 before controls presented in Attachment D were calculated using AP-42 emission factors and since these better represent the sources potential to emit than the calculations done using grain loading information, the emissions have been corrected based on the revised calculations.

Pollutant	Potential to Emit (tons/yr)
PM	~~204.16~~ **28.19**
PM-10	~~204.16~~ **7.20**
SO_2	0.0
VOC	0.0
CO	0.0
NO_x	0.0

Comment #2

Technical Support Document (Page 4 of 11)

The annual potential to emit (PTE) PM and PM-10 of the modification after permit issuance should be corrected to match the annual controlled PTE PM and PM-10 emission rates presented in Attachment D for each of process/facility.

Response #2

The annual potential to emit (PTE) PM and PM-10 of the modification after control have been corrected to match the annual controlled PTE PM and PM-10 emission rates presented in Attachment D for each of process/facility.

Potential to Emit of Modification After Issuance

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
NBP-9C (1)	~~0.01~~ **0.02**	~~0.01~~ **0.0043**	-	-	-	-	-
NBP-9D (1)	~~0.01~~ **0.02**	~~0.01~~ **0.0043**	-	-	-	-	-
NBP-9E (1)	~~1.84~~ **0.05**	~~1.84~~ **0.021**	-	-	-	-	-
NBP-22A (1)	~~0.19~~ **0.21**	~~0.19~~ **0.047**	-	-	-	-	-

Total Emissions	~~2.05~~ **0.30**	~~2.05~~ **0.077**	-	-	-	-	-

(1) Based on controlled PM and PM-10 potential emissions.

Comment #3

Technical Support Document (Page 4 of 11)

The annual potential to emit (PTE) PM and PM-10 of the modification after permit issuance should be corrected in the 326 IAC 2-2 and 40 CFR 52.21 PSD discussion paragraph to match the annual controlled PTE PM and PM-10 emission rates presented in Attachment D for each of process/facility.

Response #3

The annual potential to emit (PTE) PM and PM-10 of the modification after control have been corrected in the 326 IAC 2-2 and 40 CFR 52.21 PSD discussion paragraph.

326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration (PSD))

This modification to a PSD major source is not subject to this rule. This rule applies to modifications with the potential to emit (PTE) greater than or equal to 25 tons of PM per year and the potential to emit (PTE) greater than or equal to 15 tons of PM-10 per year. This modification is controlled to a PTE PM and PM-10 of ~~2.05~~ **0.30 and 0.077** tons per year**, respectively,** ~~each~~ by using fabric filters. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

Comment #4

Technical Support Document (Page 5 of 11)

The maximum hourly PM and PM-10 of the modification after permit issuance should be corrected in the 326 IAC 6-3-2 discussion paragraph to match the maximum hourly controlled PM and PM-10 emission rates presented in Attachment D for each of process/facility.

The last paragraph in the 326 IAC 6-3-2 discussion corrects the nomenclature from “baghouses” to “fabric filters” and lists all four fabric filters (NBP-9C, NBP-9D, NBP-9E, and NBP-22A) instead of just two fabric filters (NBP-9E and NBP-22A).

Response #4

The maximum hourly PM and PM-10 of the modification after permit issuance have been corrected. The nomenclature has been changed from “baghouses” to “fabric filters” and all four fabric filters (NBP-9C, NBP-9D, NBP-9E, and NBP-22A) have been listed instead of just two fabric filters (NBP-9E and NBP-22A).

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 the particulate shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Facilities	Process Weight Rate (tons/hr)	PM Allowable Emissions (lb/hr)	Compliance Calculations (lb/hr)
NBP-9C	12.5	5.0	~~0.16~~ **0.40** (uncontrolled)
NBP-9D	12.5	5.0	~~0.16~~ **0.40** (uncontrolled)
NBP-9E	9.0	12.0	~~0.42~~ **1.23 (uncontrolled)**
NBP-22A	13.75	15.0	~~0.04~~ **4.81(uncontrolled)**

These facilities are in compliance with these PM allowable emissions, since their emissions ~~after~~ before control are less than the PM allowable emissions. ~~The baghouses shall be in operation at all times NBP-9E and NBP-22A are in operation, in order to comply with these limits.~~ **The fabric filters are not required in order to comply with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) since the uncontrolled potential to emit of units NBP-9C, NBP-9D, NBP-9E, and NBP-22A are well below their respective allowable emissions, as shown above. However, the source has volunteered to use the fabric filters.**

Comment #5

Compliance Requirements (Pages 5 and 6 of 11)

As discussed above, the compliance monitoring requirements proposed in the Draft SPM Permit and in the TSD are not applicable because:

the facilities (fabric filters) are not subject to Compliance Assurance Monitoring Requirements and

(1) the facilities (fabric filters) are addressed by 326 IAC 2-7-5(13), which is included in the permit as Condition D.2.2 Preventative Maintenance Plan.

Response #5

There are no Compliance Monitoring Requirements applicable to NBP-9C, NBP-9D, NBP-9E, and NBP-22A since the uncontrolled potential to emit from each of these facilities based on 8,760 hours of operation will not exceed the 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) limit.

The following are responses to the comments to the permit document made by the applicant (**bolded** language has been added, the language with a ~~line~~ through it has been deleted).

Comment #1

A.2(b)(9) Alter paragraphs (L) through (O) by adding the words “constructed in 2003” to be consistent with paragraphs (A) through (K) in this section. Additionally, remove the hypens in the emission point identification numbers and the control device numbers to be consistent with paragraphs (A) through (K). Correct the spelling of “Whole” in Condition A.2(b)(9)(E).

D.2(9) Alter paragraphs (L) through (O) by adding the words "constructed in 2003" to be consistent with paragraphs (A) through (K) in this section. Additionally, remove the hypens in the emission point identification numbers and the control device numbers to be consistent with paragraphs (A) through (K).

Response #1

Paragraphs (L) through (O) in Sections A.2(b)(9) and D.2(9) have been revised to include the construction date.

(L) Corn Unloading/Storage Silo #4 , identified as NBP9C, **constructed in 2003,** utilizing a fabric filter for particulate control and exhausting to stack NBP9C;
(M) Corn Unloading/Storage Silo #5, identified as NBP9D, **constructed in 2003,** utilizing a fabric filter for particulate control and exhausting to stack NBP9D;
(N) Corn Transfer/Cleaner, identified as NBP9E, **constructed in 2003,** utilizing a fabric filter for particulate control and exhausting to stack NBP9E;
(O) Cornmeal Unloading Silo #3, identified as NBP22A, **constructed in 2003,** utilizing a fabric filter for particulate control and exhausting to stack NBP22A;

Comment #2

D.2.1 Current Condition D.2.1 should not be altered as part of this Draft SPM because the facility is not altering any portion of this existing condition as part of this application.

Response #2

There were no changes to this condition as a result of the proposed Significant Permit Modification.

Comment #3

D.2.2 Add the four proposed emission point identification numbers and fabric filters (NBP-9C, NBP-9D, NBP-9E, and NBP-22B) to the list of fabric filters in alpha-numeric order. The four proposed fabric filters will be required to be included in the facility's Preventative Maintenance Plan. Correct the alpha-numeric equipment list and correct the condition's verbage as noted in Attachment B.

Response #3

The Preventative Maintenance Plan condition have been revised to include the four fabric filters.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the fabric filter controlled devices venting to the atmosphere associated with **the** equipments identified as **NBP-9C, NBP-9D,** NBP-9E, ~~NBP-22A,~~ NBP-18, NBP-19, NBP-20, NBP-21, **NBP-22A,** NBP-23, NBP-24, NBP-37, and NBP-38 and their control devices.

Comment #4

D.2.3 Current Condition D.2.3 should not be altered as part of this Draft SPM because the facility is not altering any portion of this existing condition as part of this application.

Response #4

There were no changes to this condition as a result of the proposed Significant Permit Modification.

Comment #5

D.2.4 Current Condition D.2.4 should not be altered as part of this Draft SPM because the facility is not altering any portion of this existing condition as part of this application.

Response #5

There were no changes to this condition.

Comment #6

D.2.5 Remove this proposed condition from the Draft SPM because the facility is not altering any portion of this existing condition as part of this application. The fabric filter Preventative Maintenance Plan, proposed Condition D.2.2, addresses all four of the proposed fabric filter control devices (NBP-9C, NBP-9D, NBP-9E, and NBP-22A) which are venting to the atmosphere.

Current Condition D.2.5, the Record Keeping Requirements, should not be altered as part of this Draft SPM because the facility is not altering any portion of this existing condition as part of this application.

D.2.6 Remove this condition from the Draft SPM because the facility is not proposing to install any fabric filter control devices which are subject to the Compliance Assurance Monitoring (CAM) rules. As shown in Attachment D, the proposed uncontrolled PM10 potential emissions from each of the fabric filters is less than 100 tons per year, therefore CAM rules are not applicable and the control devices do not require a condition related to parametric monitoring.

D.2.7 Remove this condition from the Draft SPM because the facility is not proposing to install any fabric filter control devices which are subject to the Compliance Assurance Monitoring (CAM) rules. As shown in Attachment D, the proposed uncontrolled PM10 potential emissions from each of the fabric filters is less than 100 tons per year, therefore CAM rules are not applicable and the control devices do not require a condition related to baghouse inspections.

D.2.8 Remove this condition from the Draft SPM because the facility is not proposing to install any fabric filter control devices which are subject to the Compliance Assurance Monitoring (CAM) rules. As shown in Attachment D, the proposed uncontrolled PM10 potential emissions from each of the fabric filters is less than 100 tons per year, therefore CAM rules are not applicable and the control devices do not require a condition related to broken or failed bag detection.

D.2.9 Draft SPM Condition D.2.9 should be renumbered to Condition D.2.5. Remove paragraphs (a), (b), and (c) of Draft SPM Condition D.2.9 because the facility has previously addressed the Record Keeping Requirements in existing Condition D.2.5. Additionally, paragraphs (a), (b), and (c) of Draft SPM Condition D.2.9 should be removed because the facility is not proposing to install any fabric filter control devices which are subject to the Compliance Assurance Monitoring (CAM) rules. As shown in Attachment D, the proposed uncontrolled PM10 potential emissions from each of the fabric filters is less than 100 tons per year, therefore CAM rules are not applicable and the control devices do not require a record keeping requirement conditions related to baghouses that are subject to CAM rules. The last paragraph of Draft SPM Condition D.2.9 should be renumbered to Condition D.2.5(a).

Response #6

The modification to this source is not subject to the CAM rule. The CAM rule applies to significant modification involving a pollutant-specific emissions unit with the potential to emit before controls equal to or greater than one hundred (100) tons per year, and that is subject to an emission limit and has a control device that is necessary to meet that limit. However, the modification is potentially subject to Compliance Monitoring Requirements (326 IAC 2-7-6(1)) for units with a control device and an allowable emissions of greater than 10 lb/hr for the controlled pollutant. Both units NBP-9E and NBP-22A are controlled and have allowable emissions of 12 lb/hr and 15 lb/hr respectively, but the uncontrolled potential to emit from each of these facilities will not exceed the 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) limit. Therefore, no compliance monitoring is required for these facilities. The compliance monitoring conditions listed as D.2.5, D.2.6, D.2.7, D.2.8 and the related record keeping condition D.2.9 (a), (b) and (c) have therefore been removed from the permit. The record keeping condition has been re-numbered from D.2.9 to D.2.6.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.2.5 Visible Emissions Notations~~

~~(a) Visible emission notations of NBP-9E and NBP-22A stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~

~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~

~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~

~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~

~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

~~D.2.6 Parametric Monitoring~~

~~The Permittee shall record the total static pressure drop across the baghouses used in conjunction with NBP-9E and NBP-22A, at least once per shift when the units are in operation. When for any one reading, the pressure drop across the baghouses are outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan -Failure to Take Response. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

~~The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.~~

~~D.2.7 Baghouse Inspections~~

~~An inspection shall be performed each calender quarter of all bags controlling the units. All defective bags shall be replaced.~~

~~D.2.8 Broken or Failed Bag Detection~~

~~In the event that bag failure has been observed:~~

~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

~~(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.~~9~~**6** Record Keeping Requirements

~~(a) To document compliance with Condition D.2.5, the Permittee shall maintain once per shift records of visible emission notations of NBP-9E and NBP-22A stack exhausts.~~

~~(b) To document compliance with Condition D.2.6, the Permittee shall maintain once per shift records of the total differential static pressure during normal operation.~~

~~(c) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7.~~

~~(d)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Upon further review, the OAQ has decided to make the following changes to the Significant Permit Modification. Bolded language has been added.

1. A new Condition D.2.2 has been added to the permit for the units complying with the no visible emissions standard. This condition is one of the requirements for minor source modifications for which the potential to emit of a regulated pollutant is limited to less than twenty-five (25) tons per year pursuant to 326 IAC 2-7-10.5(d)(5)(C). All other conditions of the permit have been re-number accordingly.

D.2.2 Visible Emissions [326 IAC 2-7-10.5(d)(5)(C)]

Pursuant to 326 IAC 2-7-10.5(d)(5)(C)(ii) the operation of units NBP-9C, NBP-9D, NBP-9E, and NBP-22B may continue only if there are no visible emissions.